

UNITED STATES DISTRICT COURT

for the
Central District of California

In the Matter of the Search of)
United States Postal Service Priority Mail Express)
parcels bearing tracking numbers EI 687 393 826) Case No. 8:23-MJ-00481
US, EI 706 724 925 US, EI 698 486 719 US, EI 658)
867 555 US, and EI 356 181 240 US, in the custody)
of the Chino Police Department in Chino, California

APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property (*identify the person or describe the property to be searched and give its location*):

See Attachment A

located in the Central District of California, there is now concealed (*identify the person or describe the property to be seized*):

See Attachment B

The basis for the search under Fed. R. Crim. P. 41(c) is (*check one or more*):

- evidence of a crime;
- contraband, fruits of crime, or other items illegally possessed;
- property designed for use, intended for use, or used in committing a crime;
- a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

<i>Code Section</i>	<i>Offense Description</i>
21 U.S.C. § 841(a)(1)	Distribution and possession with intent to distribute a controlled substance
21 U.S.C. § 843(b)	Unlawful Use of a Communication Facility to Facilitate the Distribution of a Controlled Substance

The application is based on these facts:

See attached Affidavit

- Continued on the attached sheet.

Delayed notice of _____ days (*give exact ending date if more than 30 days: _____*) is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

/s/ David Thompson

Applicant's signature

David Thompson, TFO, USPIS

Printed name and title

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Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: _____

Judge's signature

City and state: Santa Ana, California

Hon. Karen E. Scott, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

I, David Thompson, being duly sworn, declare and state as follows:

I. TRAINING AND EXPERIENCE

1. I am a Task Force Officer ("TFO") with the United States Postal Inspection Service ("USPIS") and have been so employed since December of 2021. I am currently assigned as a Task Force Officer to the Contraband Interdiction and Investigations South Team of the Los Angeles Division, which is responsible for investigating drug trafficking violations involving the United States Mail. As such, I am an "investigative or law enforcement officer" of the United States within the meaning of Title 18, United States Code, Section 2510(7); that is, an officer of the United States empowered by law to conduct investigations of, and to make arrests for, offenses enumerated in Title 18, United States Code, Section 2516. Prior to being assigned as a TFO with the USPIS, I worked patrol and investigations as a full-time sworn law enforcement officer with the Chino Police Department ("CPD"). I have been a sworn law enforcement officer since October 2013. I am a Police Officer within the meaning of Section 830.1 of the California Penal Code.

2. I have received training and have experience investigating violations of state and federal narcotics and money laundering laws, including, but not limited to Title 21, United States Code, Sections 841, 846, 952, 959 and 963 and Title 18, United States Code, Section 1956(a). I have been

involved in various electronic surveillance methods including state and federal wiretap investigations, the debriefing of informants and witnesses, as well as others who have knowledge of the manufacturing, distribution, transportation, storage, and importation of controlled substances and the laundering of drug proceeds.

3. I have participated in many aspects of drug investigations, including investigations into the smuggling of illegal drugs, money laundering, and extortion related to drug trafficking. I am familiar with narcotics traffickers' methods of operation, including the manufacturing, storage, transportation, and distribution of narcotics, the collection of money that represents the proceeds of narcotics trafficking, and money laundering. I am also familiar with the manner in which narcotics traffickers transport and distribute narcotics in areas they control. I am familiar with how drug traffickers utilize counter-surveillance techniques to avoid detection by law enforcement. I also know that drug traffickers often communicate with their drug-trafficking associates through the use of cellular telephones. I have become aware that more sophisticated drug trafficking networks now utilize the dark web, e-mail, Voice over Internet Protocol, video chat, internet messaging services, and social networking sites to communicate with one another. During drug-related communications, traffickers often use coded or cryptic language to disguise the drug-related nature of their conversations.

II. PURPOSE OF AFFIDAVIT

4. This affidavit is made in support of a search warrant for the SUBJECT PARCELS described below and in Attachment A, for the items listed below and in Attachment B. The items to be seized constitute the fruits, instrumentalities, and evidence of violations of Title 21, United States Code, Sections 841(a)(1) (Possession with Intent to Distribute a Controlled Substance) and 843(b) (Unlawful Use of a Communication Facility to Facilitate the Distribution of a Controlled Substance).

5. The facts set forth in this affidavit are based upon my personal observations, my training and experience, and information obtained from various law enforcement personnel and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not purport to set forth all of my knowledge of or investigation into this matter. Unless specifically indicated otherwise, all conversations and statements described in this affidavit are related in substance and in part only.

III. PARCELS TO BE SEARCHED

6. This affidavit is made in support of an application for a search warrant for the following five United States Postal Service ("USPS") Priority Express parcels (hereinafter referred to as the "SUBJECT PARCELS"). The SUBJECT PARCELS are currently secured at the Chino Police Department located at 5450 Guardian Way, Chino, California:

a. SUBJECT PARCEL 1 is a United States Postal Service Priority Mail Express parcel bearing tracking number EI

687 393 826 US. SUBJECT PARCEL 1 is a USPS Priority Mail medium sized box. SUBJECT PARCEL 1 is addressed to "Justin McCoy, 16787 Beach Blvd, Huntington Beach, CA P.O. 683, 92647." The return address listed on SUBJECT PARCEL 1 is "Andrew Colella, 1414 5th Ave, Bagshore, NY 11706." SUBJECT PARCEL 1 was postmarked on September 13, 2023, in the 11706 ZIP code.

b. SUBJECT PARCEL 2 is a United States Postal Service Priority Mail Express parcel bearing tracking number EI 706 724 925 US. SUBJECT PARCEL 2 is a brown cardboard box. SUBJECT PARCEL 2 is addressed to "Natrina Baker, 328 W Summerfield Circle, Anaheim Ca. 92802." The return address listed on SUBJECT PARCEL 2 is "EVETTE MONTAQUE, 5813 Fisher Rd. Apt 11, Temple Hills MD 20748." SUBJECT PARCEL 2 was postmarked on September 12, 2023, in the 20748 ZIP code.

c. SUBJECT PARCEL 3 is a United States Postal Service Priority Mail Express parcel bearing tracking number EI 698 486 719 US. SUBJECT PARCEL 3 is a white cardboard box. SUBJECT PARCEL 3 is addressed to "3327 east 4 th Street, Los angeles CA 90063, Camllo lopez." The return address listed on SUBJECT PARCEL 3 is "Sebastian Gomez, 58 Ne 14 th St, Miami Fl 3132, Art Plaza Tower Apt 902." SUBJECT PARCEL 3 was postmarked on September 12, 2023, in the 33145 ZIP code.

d. SUBJECT PARCEL 4 is a United States Postal Service Priority Mail Express parcel bearing tracking number EI 658 867 555 US. SUBJECT PARCEL 4 is USPS Priority mail Express Flat Rat Envelope. SUBJECT PARCEL 4 is addressed to "Jereme Alexander, 16787 Beach Blvd #613, Huntington Beach ca 92647."

The return address listed on SUBJECT PARCEL 4 is "Billy H, 4704 Lillian Dr, Alexandria VA 22310." SUBJECT PARCEL 4 was postmarked on September 13, 2023, in the 20009 ZIP code.

e. SUBJECT PARCEL 5 is a United States Postal Service Priority Mail Express parcel bearing tracking number EI 356 181 240 US. SUBJECT PARCEL 5 is USPS Priority Mail Flat Rate box. SUBJECT PARCEL 5 is addressed to "Elysa Caldwell, 621 S Spring Street Apt 704, Los Angeles, CA 90014." The return address listed on SUBJECT PARCEL 5 is "Steven Caldwell, 22326 Midway Blvd, Port Charlotte, Fl, 33952." SUBJECT PARCEL 5 was postmarked on September 13, 2023, in the 33952 ZIP code.

IV. ITEMS TO BE SEIZED

7. The items to be seized from the SUBJECT PARCELS constitute fruits, instrumentalities, and evidence of violations of Title 21, United States Code, Sections 841(a)(1) and 843(b). The items to be seized are identified in Attachment B and are incorporated herein by reference.

V. STATEMENT OF PROBABLE CAUSE

A. Background

8. As described in detail below, the SUBJECT PARCELS are inbound parcels to the Southern California area from different regions of the United States and were selected for investigation because they met certain criteria common to packages containing contraband. The SUBJECT PARCELS are believed to contain controlled substances or the proceeds from the trafficking of controlled substances based on, among other things, positive alerts by a trained narcotics-detection canine.

9. Based on my training and discussions with experienced Postal Inspectors, I know that Postal Inspectors have been conducting investigations of drug trafficking via USPS Express Mail and Priority Mail since the mid-1980s. In particular, they began conducting organized interdictions of Express Mail and Priority Mail parcels suspected of containing controlled substances and proceeds from the sale of controlled substances in Los Angeles, California, in the early 1990s. Along with conducting organized interdictions, Postal Inspectors also regularly examine and investigate Express Mail and Priority Mail parcels throughout the year. During the 1990s, Postal Inspectors observed that the trend was for drug traffickers to send controlled substances and proceeds from the sale of controlled substances using boxes, with the proceeds in the form of cash. Although Postal Inspectors still see the use of boxes for controlled substances and cash, there has been a gradual change over the years toward the current trend of smaller boxes, flat cardboard envelopes, and Tyvek envelopes, with proceeds from the sale of controlled substances converted to money orders. By using money orders, drug traffickers are able to send large dollar amounts in compact form, using much smaller conveyances that lend a sense of legitimacy to the parcel.

10. From my training, personal experience, and the collective experiences related to me by Postal Inspectors on my team who specialize in investigations relating to the mailing of controlled substances and drug proceeds, I am aware that the greater Los Angeles area is a major source area for controlled

substances. As such, controlled substances are frequently transported from the greater Los Angeles area via the United States Mail, and the proceeds from the sale of the controlled substances are frequently returned to the greater Los Angeles area via the United States Mail. These proceeds are generally in large amounts of money over \$1,000.

11. I also know based on my training and experience that drug traffickers will often use one of two USPS services: Priority Mail Express Service, which is the overnight/next day delivery mail service, and Priority Mail Service, which is the two-to-three day delivery mail service. Drug traffickers use Priority Mail Express delivery services because of their speed, reliability, and the ability to track the package's progress to the intended delivery point. Drug traffickers often use Priority Mail delivery services because they allow drug traffickers more time for travel between states if they are following their shipments to their destinations for distribution. Like Priority Mail Express, Priority Mail also allows drug traffickers to track the package's progress to the intended delivery point.

12. Based on information derived and built upon over many years, I, like other Postal Inspectors and Task Force Officers, initially look for certain characteristics when examining Priority Mail Express and Priority Mail for controlled substances or drug proceeds. These characteristics include:

a. The article is contained in a box, flat cardboard mailer, or Tyvek envelope;

b. The article bears a handwritten label; and/or
c. The handwritten label on the article does not contain a business account number.

13. Parcels found to meet these characteristics are scrutinized by Postal Inspectors and Task Force Officers through further investigation, which may include return and addressee address verifications and trained narcotics-detecting canine examination. Postal Inspectors and Task Force Officers will also look for additional drug or drug proceed parcel characteristics such as:

a. The seams of the article are taped or glued shut;
b. The article emits the odor of a cleaning agent, adhesive, or spray foam, detectable by a human; and/or
c. Multiple articles are mailed to the same individual, on the same day, from different locations.

14. Based on my training and experiences and information learned during discussions with Postal Inspectors, I know that drug traffickers often use fictitious or incomplete names and/or addresses in an effort to conceal their identity from law enforcement. Indeed, it is my experience that when real addresses are used, it is only to lend a legitimate appearance to the parcel and is almost always paired with a false name.

B. Investigation of the SUBJECT PARCELS

15. During the week of September 12, 2023, through September 15, 2023, I conducted routine parcel interdiction of parcels passing through the USPS Processing and Distribution Center in the City of Industry. The parcels were initially

screened and those that were deemed suspicious were set aside for additional screening. On September 19, 2023, the parcels were retrieved from the City of Industry USPS Processing and Distribution Center, and I inspected them further. I discovered the SUBJECT PARCELS also met some of the initial suspicious characteristics described above in paragraph 13. Specifically:

a. SUBJECT PARCEL 1 had handwritten address information in ink on the box and did not contain a business account number. Based on my training and experience, I know that drug traffickers will often hand write addresses on parcels because it is easy to remain anonymous and use return addresses that won't verify with the USPS database.

b. SUBJECT PARCEL 2 had handwritten address information in ink and did not contain a business account number. SUBJECT PARCEL 2 also had excessive tape covering all sides. Based on my training and experience, I know that drug traffickers often use a large amount of tape on the seams of packages containing narcotics as an attempt to avoid detection by a narcotic detection canine.

c. SUBJECT PARCEL 3 had handwritten address information in ink and did not contain a business account number. SUBJECT PARCEL 3 also had excessive tape along the seams and corners.

d. SUBJECT PARCEL 4 had handwritten address information in ink and did not contain a business account number. SUBJECT PARCEL 4 did not have any phone numbers listed. Based on my training and experience, I know subjects who send or

receive narcotics and proceeds from narcotics sales often do not write phone numbers on the parcel to avoid being associated to the parcel by law enforcement.

e. SUBJECT PARCEL 5 had handwritten address information in ink and did not contain a business account number. SUBJECT PARCEL 5 did not have any phone numbers listed and had excessive tape around the parcel.

C. Investigation of SUBJECT PARCELS Using CLEAR Database Checks

16. On September 19, 2023, I examined the SUBJECT PARCELS and reviewed CLEAR database¹ records related to the sender and recipient information listed on the SUBJECT PARCELS and learned the following:

a. With respect to SUBJECT PARCEL 1, the listed sender "Andrew Colella" was associated to the listed sender address, most recently as the year 2020. The listed recipient, "Justin McCoy," was not associated with the listed recipient address.

b. With respect to SUBJECT PARCEL 2, the listed sender "Evette Montaque" was associated with the listed sender address, as recently as 2021. In addition, the listed recipient, "Natrina Baker," was not associated with the listed recipient address.

c. With respect to SUBJECT PARCEL 3, the listed sender, "Sebastian Gomez" was not associated with the listed

¹ CLEAR is a public information database used by law enforcement that provides names, addresses, telephone numbers, and other identifying information.

sender address. In addition, the listed recipient, "Camllo lopez," was not associated with the listed recipient address.

d. With respect to SUBJECT PARCEL 4, the listed sender "Billy H," was not associated with the listed sender address. In addition, the listed recipient, "Jereme Alexander," was associated with the listed recipient address, as recently as 2020.

e. With respect to SUBJECT PARCEL 5, the listed sender, "Steven Caldwell" was not associated with the listed sender address. In addition, the listed recipient, "Elysa Caldwell," was not associated with the listed recipient address.

D. Positive Canine Alert on the SUBJECT PARCELS

17. On September 20, 2023, Chino Police Department Officer Angel Bran and his narcotics-detection canine, "Cyra," conducted an exterior examination of each of SUBJECT PARCELS. These exterior examinations were completed individually, with the use of decoy parcels. Officer Bran told me that Cyra gave a positive alert to each of these SUBJECT PARCELS, indicating the presence of controlled substances or other items that emitted the odor of controlled substances, in the SUBJECT PARCELS. Attached hereto as Exhibit 1, which I incorporate fully herein by reference, are documents setting forth Officer Bran's and Cyra's training and experience in detecting controlled substances, and the examination of SUBJECT PARCELS.

VI. CONCLUSION

18. Based on the above, I believe there is probable cause to believe that the SUBJECT PARCELS described in Attachment A

each contain evidence of violations of Title 21, United States Code, Sections 841(a)(1) and 843(b).

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone on this ____ day of September 2023.

THE HONORABLE KAREN E. SCOTT
UNITED STATES MAGISTRATE JUDGE

ATTACHMENT A

PARCELS TO BE SEARCHED

1. This affidavit is made in support of an application for a search warrant for the following six United States Postal Service ("USPS") Priority Mail Express parcels (hereinafter referred to as the "SUBJECT PARCELS"). All the SUBJECT PARCELS are currently secured at the Chino Police Station located at 5450 Guardian Way, Chino, California:

a. SUBJECT PARCEL 1 is a United States Postal Service Priority Mail Express parcel bearing tracking number EI 687 393 826 US. SUBJECT PARCEL 1 is a USPS Priority Mail medium sized box. SUBJECT PARCEL 1 is addressed to "Justin McCoy, 16787 Beach Blvd, Huntington Beach, CA P.O. 683, 92647." The return address listed on SUBJECT PARCEL 1 is "Andrew Colella, 1414 5th Ave, Bagshore, NY 11706." SUBJECT PARCEL 1 was postmarked on September 13, 2023, in the 11706 ZIP code.

b. SUBJECT PARCEL 2 is a United States Postal Service Priority Mail Express parcel bearing tracking number EI 706 724 925 US. SUBJECT PARCEL 2 is a brown cardboard box. SUBJECT PARCEL 2 is addressed to "Natrina Baker, 328 W Summerfield Circle, Anaheim Ca. 92802." The return address listed on SUBJECT PARCEL 2 is "EVETTE MONTAQUE, 5813 Fisher Rd. Apt 11, Temple Hills MD 20748." SUBJECT PARCEL 2 was postmarked on September 12, 2023, in the 20748 ZIP code.

c. SUBJECT PARCEL 3 is a United States Postal Service Priority Mail Express parcel bearing tracking number EI 698 486 719 US. SUBJECT PARCEL 3 is a white cardboard box.

SUBJECT PARCEL 3 is addressed to "3327 east 4 th Street, Los angeles CA 90063, Camllo lopez." The return address listed on SUBJECT PARCEL 3 is "Sebastian Gomez, 58 Ne 14 th St, Miami Fl 3132, Art Plaza Tower Apt 902." SUBJECT PARCEL 3 was postmarked on September 12, 2023, in the 33145 ZIP code.

d. SUBJECT PARCEL 4 is a United States Postal Service Priority Mail Express parcel bearing tracking number EI 658 867 555 US. SUBJECT PARCEL 4 is USPS Priority mail Express Flat Rat Envelope. SUBJECT PARCEL 4 is addressed to "Jereme Alexander, 16787 Beach Blvd #613, Huntington Beach ca 92647." The return address listed on SUBJECT PARCEL 4 is "Billy H, 4704 Lillian Dr, Alexandria VA 22310." SUBJECT PARCEL 4 was postmarked on September 13, 2023, in the 20009 ZIP code.

e. SUBJECT PARCEL 5 is a United States Postal Service Priority Mail Express parcel bearing tracking number EI 356 181 240 US. SUBJECT PARCEL 5 is USPS Priority Mail Flat Rate box. SUBJECT PARCEL 5 is addressed to "Elysa Caldwell, 621 S Spring Street Apt 704, Los Angeles, CA 90014." The return address listed on SUBJECT PARCEL 5 is "Steven Caldwell, 22326 Midway Blvd, Port Charlotte, Fl, 33952." SUBJECT PARCEL 5 was postmarked on September 13, 2023, in the 33952 ZIP code.

ATTACHMENT B

ITEMS TO BE SEIZED

1. The following are the items to be seized from SUBJECT PARCELS 1 through 5, which constitute the fruits, instrumentalities, and evidence of violations of Title 21, United States Code, Sections 841(a)(1) (Distribution and Possession with Intent to Distribute a Controlled Substance) and 843(b) (Unlawful Use of a Communication Facility (including the mails) to Facilitate the Distribution of a Controlled Substance):

- a. Any controlled substances, including marijuana;
- b. Currency, money orders, bank checks, or similar monetary instruments in aggregate quantities over \$1,000; and
- c. Any associated packaging.